

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**INFORMATIVE MOTION REGARDING THE STIPULATION AND ORDER FOR THE
PRODUCTION AND EXCHANGE OF INFORMATION**

To the Honorable United States District Court Judge Laura Taylor Swain:

On January 10, 2020, the Court entered the *Stipulation and Order for the Production and Exchange of Confidential Information* (D.E. No. 9797) (the “Stipulation”). Paragraph 27 of the Stipulation provides that “[a]ny party that has filed a notice of participation pursuant to the Initial Objection Procedures adopted by the Court ... may become a Party to this Stipulation and be bound by its terms by executing and filing with the Court its agreement to comply with the terms and conditions of this Stipulation[.]” Stipulation, ¶ 27.

The undersigned is counsel to Defendants 55H and 56H. Defendants 55H and 56H timely filed their notice of appearance in the adversary proceeding number 19-000359 and, thus, are

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

participants to the Initial Objection Procedures adopted by the Court. Attached as Exhibit 1 is the executed document required by Paragraph 27 of the Stipulation that joins Defendants 55H and 56H as Parties to the Stipulation.

Respectfully submitted.

In Guaynabo, Puerto Rico, on January 21, 2020.

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s/ Moraima S. Ríos Robles
Moraima S. Ríos Robles
USDC-PR No. 224912

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notice electronically to all counsel of record, and will provide hard copies to the Court and United States Trustee as soon as practical after the filing of the foregoing, consistent with the Court's Tenth Amended Case Management Order. *See* Docket No. 8027-1.

Dated: January 21, 2020.

s/ Moraima S. Ríos Robles
Moraima S. Ríos Robles
USDC-PR No. 224912

EXHIBIT 1

Defendants 55H and 56H Joinder to the Stipulation

AGREEMENT TO RESPECT CONFIDENTIAL MATERIAL

I, Moraima S. Ríos-Robles, state that:

1. My address is PMB 688, 1353 Ave. Luis Vigoreaux, Guaynabo, PR 00966.
2. I am a partner in the law firm of Arroyo & Ríos Law Offices, P.S.C.
3. My present job description is counsel to Defendants 55H and 56H in the above-captioned case.
4. I have received a copy of the Stipulation and Order for the Production and Exchange of Confidential Information (the “Stipulation”) entered in the above-entitled actions on January 10, 2020.
5. I have carefully read and understand the provisions of the Stipulation.
6. I will comply with all the provisions of the Stipulation.
7. I will hold in confidence, will not disclose to anyone not qualified under the Stipulation, and will use only for purposes of these actions, any Confidential Information that is disclosed to me.
8. I will return all Confidential Information that comes into my possession, and documents or things that I have prepared relating thereto, to counsel for the party by whom I am employed or retained, or to counsel from whom I received the Confidential Information.
9. I hereby submit to the jurisdiction of this court for the purpose of enforcement of the Stipulation in this action.

Dated: January 21, 2020.

/s/ Moraima S. Ríos-Robles
Moraima S. Ríos – Robles